



Rigid Plastic Packaging Container (RPPC) Informal Rulemaking Process Advisory Committee

**Cal/EPA Building
Conference Room 350
May 16, 2007**

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www.ciwmb.ca.gov

Agenda

zero waste
CALIFORNIA
INTEGRATED WASTE MANAGEMENT BOARD



TIME	TOPIC
9:00 - 9:10	Welcome / Introductions / Agenda Review
9:10 - 9:30	<ul style="list-style-type: none">Recap of survey results from 04/17/07 meetingGround RulesGuiding Principles
9:30 - 12:00	<ul style="list-style-type: none">Review of Draft Regulations
12:00 - 1:00	LUNCH
1:00 - 2:00	<ul style="list-style-type: none">RPPC - definition
2:00 - 2:45	<ul style="list-style-type: none">Product Manufacturer - definition
2:45 - 3:00	BREAK
3:00 - 3:30	<ul style="list-style-type: none">California PCM Consumption Documentation
3:30 - 3:55	<ul style="list-style-type: none">Open Discussion / Public Comment
3:55 - 4:00	<ul style="list-style-type: none">Next StepsNext Meeting – Interested Parties Meeting June 26, 2007Adjourn



Advisory Committee Role

The role of the advisory committee is to provide suggestions to Board staff during the informal rulemaking process regarding changes to the California Rigid Plastic Packaging Container (RPPC) regulations



Ground Rules

- One person speaks at a time
- No interruptions
- No criticism
- Listen respectfully and sincerely
- All suggestions recorded
- Questions may be asked to clarify ideas



Need for Changes

Regulatory changes are needed to:

1. Incorporate recent statutory changes
2. Improve clarity and organization
3. Make process improvements



Rulemaking Guiding Principles – Environmental Benefits

Regulatory Changes Should:

- Support the intent of the law
- Increase use of recycled plastic in products
- Contribute toward California diversion
- Increase recycling rate of plastics
- Improve recyclability of plastics



Rulemaking Guiding Principles – Certification Process

Process Improvements Should:

- Provide for more efficient and effective implementation of the law
- Improve the clarity of the law
- Increase compliance with the law
- Ensure fair and equitable treatment



Morning Session: Review of Draft Regulations

- Walk through proposed changes
- Discuss specific issues
 1. Penalty Calculations and Factors
 2. Source Reduction
 3. Postconsumer Material (PCM) Definition
 4. Certification Process
 - Notification
 - Container Determinations



Brainstorming Process

1. Brainstorming concepts – Force Field analysis
 - ◆ List all suggestions
2. Filter concepts through guiding principles
 - ◆ Eliminate concepts that can't be addressed through regulation
3. Capture all comments



Afternoon Session: Concepts to Address in the Rulemaking

- Rigid Plastic Packaging Container – definition
 1. Labeled Volume
 2. Multiple Reclosure
 3. Entirely Made of Plastic
- Product Manufacturer - definition
- California PCM Consumption Documentation



Rigid Plastic Packaging Container

- **Labeled volume**

Rigid Plastic Packaging Container

Labeled Volume

Regulatory Changes Should: 1) Support the intent of the law; 2) Increase use of recycled plastic in products; 3) Contribute toward California diversion; 4) Increase recycling rate of plastics; 5) Improve recyclability of plastics

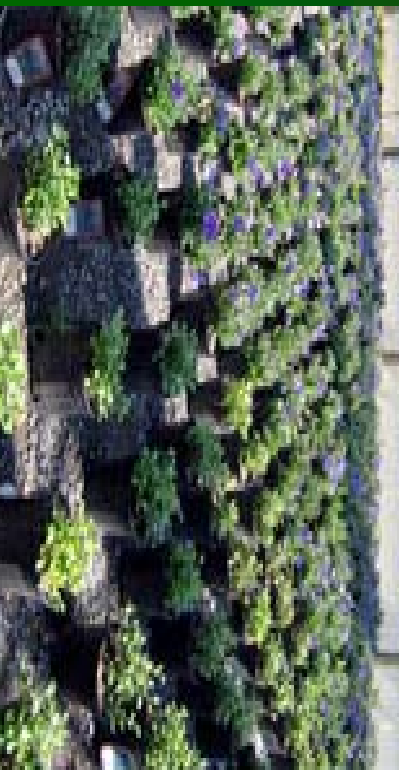
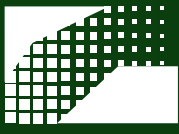
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Rigid Plastic Packaging Container

- **Remove “Capable of Multiple Reclosures”**
(expand the regulated universe)







Rigid Plastic Packaging Container

Remove “Capable of Multiple Reclosures”

Regulatory Changes Should: 1) Support the intent of the law; 2) Increase use of recycled plastic in products; 3) Contribute toward California diversion; 4) Increase recycling rate of plastics; 5) Improve recyclability of plastics

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Rigid Plastic Packaging Container

- **Capable of at least one closure**
(level the playing field)

**Capable of
Multiple
Reclosure**

**Heat
Sealed**

**Currently
Regulated**

**Currently
Not - Regulated**



**Not
Capable
of
Multiple
Reclosure**

**Currently
Not - Regulated**



**Capable of
Multiple
Reclosure
with an
attached
lid**

**Currently
Regulated**



Rigid Plastic Packaging Container

Capable of at Least one Closure

Regulatory Changes Should: 1) Support the intent of the law; 2) Increase use of recycled plastic in products; 3) Contribute toward California diversion; 4) Increase recycling rate of plastics; 5) Improve recyclability of plastics

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Rigid Plastic Packaging Container

- **Entirely Made of Plastic**
(level the playing field)

Rigid Plastic Packaging Container

Entirely Made of Plastic

Regulatory Changes Should: 1) Support the intent of the law; 2) Increase use of recycled plastic in products; 3) Contribute toward California diversion; 4) Increase recycling rate of plastics; 5) Improve recyclability of plastics

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Bucket with
an attached
Metal Handle

Bucket with
an attached
Plastic Handle

Currently
Not - Regulated

Currently
Regulated



Rigid Plastic Packaging Container

- **Status Quo**



**Currently
Regulated**

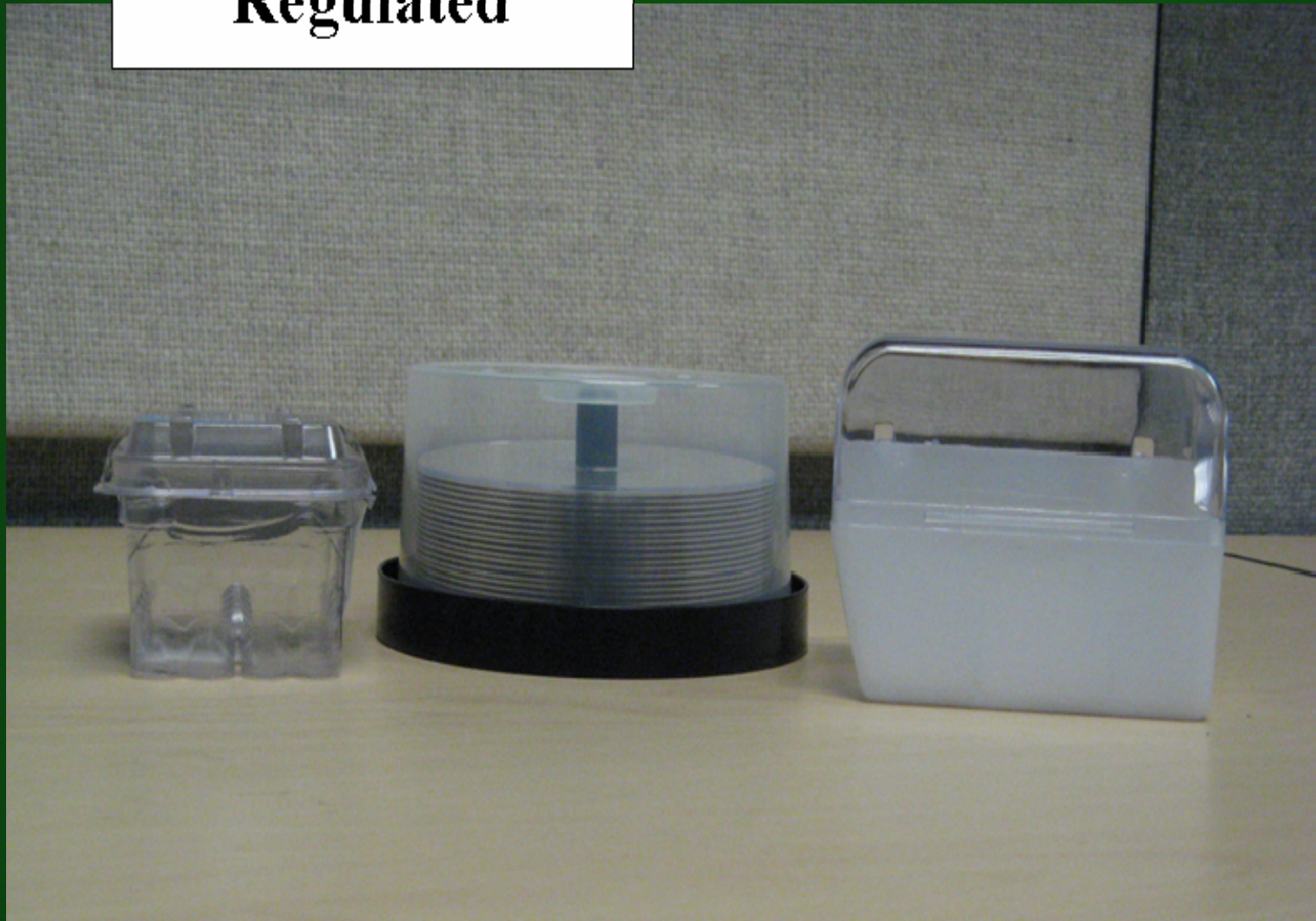


**Currently
Regulated**

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Currently Regulated



Rigid Plastic Packaging Container

Status Quo

Regulatory Changes Should: 1) Support the intent of the law; 2) Increase use of recycled plastic in products; 3) Contribute toward California diversion; 4) Increase recycling rate of plastics; 5) Improve recyclability of plastics

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Product Manufacturer

- **Clarify Responsible Reporting Agency**

Product Manufacturer

Clarify Responsible Reporting Agency

Regulatory Changes Should: 1) Support the intent of the law; 2) Increase use of recycled plastic in products; 3) Contribute toward California diversion; 4) Increase recycling rate of plastics; 5) Improve recyclability of plastics

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California PCM Consumption Documentation

- Direct Use
- Verify Third Party Contractors
- Container Manufacturer Responsibility

California PCM Consumption Documentation

Direct Use

Regulatory Changes Should: 1) Support the intent of the law; 2) Increase use of recycled plastic in products; 3) Contribute toward California diversion; 4) Increase recycling rate of plastics; 5) Improve recyclability of plastics

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California PCM Consumption Documentation

Verify Third Party Contractors

Regulatory Changes Should: 1) Support the intent of the law; 2) Increase use of recycled plastic in products; 3) Contribute toward California diversion; 4) Increase recycling rate of plastics; 5) Improve recyclability of plastics

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California PCM Consumption Documentation

Container Manufacturer Responsibility

Regulatory Changes Should: 1) Support the intent of the law; 2) Increase use of recycled plastic in products; 3) Contribute toward California diversion; 4) Increase recycling rate of plastics; 5) Improve recyclability of plastics

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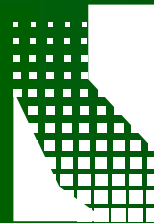


Open Discussion / Public Comment



Next Steps

1. Draft revisions to regulations incorporating today's input
 - Send revised draft regulations to Advisory Committee – June 12, 2007
2. Informal Workshop - meet with the larger group, Plastics Interested Parties, to review comments and take additional suggestions - 06/26/07



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